

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**JEFFREY ROLLINS DAVIS d/b/a  
DAVIS LAW FIRM,  
Plaintiff,**

**v.**

**JONATHAN J. ZAGER AND  
JZ PRODUCTIONS, INC.,  
Defendants.**

§  
§  
§  
§  
§  
§  
§  
§  
§

**CASE NO. 5:23-cv-791-JKP**

**JURY TRIAL DEMANDED**

**JOINT ADVISORY REGARDING DEFENDANTS’  
MOTION FOR PROTECTIVE ORDER**

COME NOW Plaintiff, Jeffrey Rollins Davis d/b/a Davis Law Firm, and Defendants, Jonathan J. Zager and JZ Productions, Inc., to file this Joint Advisory pursuant to the Court’s Order of December 6, 2023. *See* Document 36.

Defendants would advise the Court that they have conferred with counsel for Plaintiff regarding the issues set forth in Defendants’ Motion for Protective Order (Document 35). Counsel for Plaintiff continues to assert that the deposition of Defendant Jonathan J. Zager in his individual capacity should take place at the office of counsel for Plaintiff in person on January 18, 2024, in San Antonio, Texas. Defendants continue to assert that the proper venue for Defendants’ depositions is in Los Angeles, California, where Defendant Jonathan J. Zager resides and works. Plaintiff incorporates herein by reference all arguments and authorities set forth in its Response in Opposition to Defendant Jonathan J. Zager’s Motion for Protective Order (Document 37). Defendants incorporate herein by reference all arguments and authorities set forth in its Motion for Protective Order (Document 35).

Date: December 11, 2023

Respectfully submitted,

**DAVIS, CEDILLO & MENDOZA, INC.**  
McCombs Plaza, Suite 250

755 E. Mulberry Avenue  
San Antonio, Texas 78212  
Telephone No.: (210) 822-6666  
Telecopier No.: (210) 660-3795

/s/ Ricardo G. Cedillo

RICARDO G. CEDILLO

State Bar No. 04043600

[rcedillo@lawdcm.com](mailto:rcedillo@lawdcm.com)

BRANDY C. PEERY

State Bar No. 24057666

[bpeery@lawdcm.com](mailto:bpeery@lawdcm.com)

*and*

DAVID E. DUNHAM

State Bar No. 06227700

[david@dunhamllp.com](mailto:david@dunhamllp.com)

CORY A. SCANLON

State Bar No. 24104599

[cory@dunhamllp.com](mailto:cory@dunhamllp.com)

**DUNHAM LLP**

919 Congress Ave., Suite 910

Austin, TX 78701

512.615.1255 (tel)

512.615.1256 (fax)

*and*

DAVID M. PRICHARD

[dprichard@prichardyoungllp.com](mailto:dprichard@prichardyoungllp.com)

State Bar No. 16317900

(210) 477-7401 [Direct]

**PRICHARD YOUNG, LLP**

Union Square, Suite 600

10101 Reunion Place

San Antonio, Texas 78216

(210) 477-7400 [Telephone]

(210) 477-7450 [Facsimile]

**ATTORNEYS FOR PLAINTIFF**

-AND-

/s/ Mary Holmesly

Mary Holmesly  
Texas Bar No. 240579077  
Tel: (281) 724-5580  
Fax: (281) 724-5580  
Email: [mholmesly@rlattorneys.com](mailto:mholmesly@rlattorneys.com)  
**RESNICK & LOUIS, P.C.**  
1512 Center Street, Suite 100  
Houston, TX 77007

-and-

/s/ Jeffrey M. Lenkov

Jeffrey M. Lenkov  
California Bar No. 156478  
Tel: (213) 430-2632  
Fax: (213) 624-6999  
Email: [jeffrey.lenkov@manningkass.com](mailto:jeffrey.lenkov@manningkass.com)  
**MANNING & KASS**  
801 South Figueroa Street  
15th Floor  
Los Angeles, CA 90017

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that on this 11th day of December, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Mary Holmesly

MARY HOLMESLY